

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Marcus Hayes	:	Chapter 13
Debtor(s)	:	Case No. 16-16375-ELF

**MOTION TO VACATE ORDER CLOSING CH 13 CASE
WITHOUT THE ENTRY OF A DISCHARGE**

Debtor, Marcus Hayes, by and through Brad J. Sadek, Esq., moves this Honorable Court to vacate the December 23, 2021 Order closing the Chapter 13 case without the entry of a Discharge and in support thereof avers the following:

1. The Chapter 13 Bankruptcy was filed on September 9, 2016.
2. The Chapter 13 Plan was confirmed on April 21, 2020.
3. An Order was entered on October 1, 2021 granting the debtor 14 days to comply with Local Rule 4004-3 and 11 U.S. Code § 1328(g) after completing plan payments.
4. On December 23, 2021, an Order was entered closing the Chapter 13 case without the entry of a Discharge.
5. A Financial Management Course certificate was filed on December 28, 2021 at Docket Entry #43.
6. A Domestic Support Obligation Certification form was filed on December 29, 2021 at Docket Entry #44.
7. The debtor has completed all necessary end of case procedure as underlined in Local Rule 4004-3 and 11 U.S. Code § 1328(g).

WHEREFORE, Debtor, by and through the undersigned counsel, respectfully requests this Honorable Court to enter an Order Vacating the December 23, 2021 Order

closing the Chapter 13 case so that the debtor may be considered for a proper Discharge.

Respectfully submitted,

/s/ Brad J. Sadek, Esquire

Dated: December 29, 2021

Brad J. Sadek, Esquire
Sadek and Cooper
1315 Walnut Street
Suite 502
Philadelphia, PA 19107